

SONYA Z. MEHTA, SBN 294411
 SIEGEL, YEE, BRUNNER & MEHTA
 475 14th Street, Suite 500
 Oakland, California 94612
 Tel: 510-839-1200
 Fax: 510-444-6698
sonyamehta@siegelyee.com

DAT HOANG PHAN, SBN 316813
 HENNIG, KRAMER, RUIZ AND SINGH, LLP
 3600 Wilshire Boulevard
 Suite 1908
 Los Angeles, CA 90010
 Tel: 213-310-8301
 Fax: 213-310-8302
dat@employmentattorneyla.com

RETU R. SINGLA, SBN 4162822
 Tel: 646-228-4719
rsingla@workingpeopleslaw.com
 SETH L. GOLDSTEIN, SBN 2160182
 Tel: 646-460-1309
 Fax: 251-319-2955
sgoldstein@workingpeopleslaw.com
 JULIEN MIRER SINGLA AND
 GOLDSTEIN PLLC
 One Whitehall Street, 16th Floor
 New York, NY 10004
 ADMITTED PRO HAC VICE

Attorneys for Defendant
 TRADER JOE'S UNITED

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

TRADER JOE'S COMPANY, a California
 corporation,

Plaintiff,

vs.

TRADER JOE'S UNITED,

Defendant.

Case No. 2:23-cv-05664-HDV-MAR

**SINGLA DECLARATION ISO
 DEFENDANT TRADER JOE'S
 UNITED'S APPLICATION TO
 APPEAR REMOTELY**

Filed Concurrently with Application to
 Appear Remotely and [Proposed] Order

Hon. Hernán D. Vera
 Date: November 9, 2023
 Ctrm: 5B
 Time: 10:00 a.m.

Complaint Filed: July 13, 2023

DECLARATION OF ATTORNEY RETU SINGLA

I, RETU SINGLA, declare:

1. I am lead counsel for Trader Joe's United ("TJU" or "the Union") in the instant trademark infringement lawsuit Trader Joe's Company has filed against the Union. I have led this case since its inception, and I am most equipped to argue the motion. Indeed, I will argue the motion.

2. I reside in New York and will have to make a long and expensive trip to Los Angeles to appear in person for the hearing.

3. My client TJU is a fledgling union with extremely modest funds.

4. TJU needs those meager funds to fight a David v. Goliath battle in both organizing Trader Joe's employees, and then securing contracts with the Employer.

5. As detailed in the Motion to Dismiss, the National Labor Relations Board has issued multiple unfair labor practices complaints against Plaintiff Trader Joe's Company for its behavior against the Union. There can be no doubt that TJU needs its funds for the many battles currently and ahead.

6. It would significantly impact Trader Joe's United, a fledgling union with extremely modest funds, to have to pay for the flight for me to appear.

7. In addition, by eliminating the need for travel, I will have more time to engage in my frequently pro bono work for working people and newly organizing workers.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed November 1, 2023, in New York, New York.

Dated: November 1, 2023

/s/ Retu Singla

By: Retu Singla

Attorney for Defendant

JULIEN MIRER SINGLA & GOLDSTEIN PLLC

1 Whitehall Street, 16th Floor,

New York, NY 10004

(212) 231-2235

rsingla@workingpeopleslaw.com